

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In Re:	: Bankruptcy No. 18-11410-elf
Edward Joseph Dougherty	: Chapter 13
Debtor	:
	:
Washington Savings Bank	:
	:
Movant	:
	:
vs.	:
	:
Edward Joseph Dougherty	:
	:
Debtor/Respondent	:
	:
and	:
	:
William C. Miller, Esquire	:
Trustee/Respondent	:

OBJECTION TO CONFIRMATION OF THE PLAN

Washington Savings Bank (“Movant”), by its attorneys, Hladik, Onorato & Federman, LLP, objects to confirmation of the Chapter 13 Plan of Debtor, Edward Joseph Dougherty (“Debtor”), as follows:

1. As of the bankruptcy filing date of March 1, 2018, Movant holds a secured claim against the Debtor’s property, located at: 12610 Ramer Road, Philadelphia, PA 19154.
2. Movant filed a Proof of Claim (“POC”) in the amount of \$5,805.82 for pre-petition arrears on April 23, 2018.
3. The Plan currently provides for payment to Movant in the amount of \$5,000.00 for pre-peition arrears, which is an amount smaller than Movant’s POC.
4. The Plan fails to cure the delinquency pursuant to 11 U.S.C. § 1322(b)(5).
5. The Plan violates of 11 USC § 1325(a)(5)(B)(ii) by not providing for Movant to receive the full value of its claim.
6. Movant objects to the feasibility of the Plan under 11 U.S.C. § 1325(a)(6). The Plan proposed by Debtor is not feasible. Movant requests that the bankruptcy

case either be converted to a Chapter 7 or be dismissed pursuant to 11 U.S.C. § 1307.

WHEREFORE, Movant respectfully requests that this Honorable Court deny confirmation of the Debtor's Chapter 13 Plan.

Respectfully submitted,

Dated: 04/24/2018

/s/Danielle Boyle-Ebersole, Esquire
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